

EXHIBIT 1



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June 5, 2015

BRIAN D. BUCKLEY

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VIA E-MAIL (MALLAN@STEPTOE.COM)

Michael Allan
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036-1795

Re: *BMG Rights Management (US) LLC, et al. v. Cox Enterprises, Inc., et al.*
Case No. 1:14-cv-01611-LO-JFA, USDC, EDVA

Mike:

Enclosed is Cox's production in response to the Court's May 15, 2015 Order. We interpret the Court's Order to require Cox to provide personally identifiable information (PII) for those subscribers currently assigned to the 250 IP addresses referenced in the Order. Cox identified those subscribers as of the date of the Order. Of the 250 IP addresses identified in the Order, 1 is currently unassigned and not associated with any subscriber. One IP address was inadvertently missed. A notice will go out to this subscriber immediately, and if this subscriber does not object, then Cox will supplement and provide the information designated below for that subscriber. For the remaining 248, Cox notified each of the current subscribers of the Court's Order (see the form notice enclosed as Exhibit B). 32 subscribers contacted Cox to object, or indicate their intent to object, to the production of their PII. Pursuant to the Court's instructions, Cox is not producing PII for those subscribers. For the remaining 216 IP addresses, the PII for those subscribers is included in worksheet one of the enclosed spreadsheet (Exhibit A).

Cox also attempted to identify subscribers associated with the relevant IP addresses during the periods of alleged infringement identified in Exhibit 4 to Plaintiffs' motion to compel. Cox was able to identify that information for 139 of the relevant IP addresses. Cox notified those historical subscribers of the Court's Order (see the form notice enclosed as Exhibit C). 17 of those subscribers contacted Cox to object, or indicate their intent to object, to the production of their PII. Pursuant to the Court's instructions, Cox is not producing PII for those subscribers. For the remaining 122 IP addresses, the PII for those subscribers is included in worksheet two of the enclosed spreadsheet.

The Order also requires Cox to "provide a copy of any documents previously produced for these IP addresses without the name, address, account number, and bandwidth speed being redacted." Pursuant to the Court's Order, all responsive documents are enclosed in un-redacted form.

Michael Allan

June 5, 2015

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If you have any questions, please feel free to contact me.

Respectfully,

FENWICK & WEST LLP

/s/ Brian Buckley

Brian D. Buckley

Enclosures

EXHIBIT C



Subpoena Compliance Office
Cox Communications, Inc.
1400 Lake Hearn Drive
Atlanta, GA 30319
(404) 269-0100
FAX: (404) 269-1898
SubpoenaResponse@cox.com

[Date of Letter]

[Customer Name & Address]

Re: BMG Rights Management (US) LLC, et al., v. Cox Enterprises, Inc., et al.,
IP Address: [IP Address here]

Dear Cox High Speed Internet Customer:

Please be advised that on May 15, 2015 a Civil Subpoena to Produce Documents was received from BMG Rights Management. The lawsuit was filed in the U.S. District Court for the Eastern District of Virginia, Alexandria Division.

The lawsuit lists several Internet Protocol (IP) addresses for the defendants. Our records indicate that **one of the IP addresses listed was assigned to your Cox account** on the date and time described in the lawsuit.

In order to identify the defendants, the plaintiff has obtained a Court Order requiring Cox to provide certain subscriber information from our records. The purpose of this notice is to inform you that we will be producing your IP and account information so that you have the opportunity to file objections with the court and to raise any legal defenses you may have. We will comply with this subpoena on **June 8th, 2015 unless we receive notification from you of your intent to file objections or unless we receive filed legal documents that delay or terminate the process on or before June 5th, 2015.**

Because this matter involves litigation, our Customer Care staff will not be able to assist you with questions you may have. We regret being placed in the position of sending this letter, but want you to have every opportunity to protect your interests. We are not permitted to give you legal advice and **encourage you to consult an attorney immediately.**

Sincerely,
Legal Department
Cox Communications, Inc.